

Burdett, Cheryl

From: Burdett, Cheryl
Sent: Friday, November 15, 2013 2:28 PM
To: Rogers, Joan; Atkinson, Benjamin; Schwer, Don
Subject: FW: Info on suspected discharge at Prairie State Gilts CAFO in Schuyler County, IL
Attachments: ICCAW LTR to USEPA RE Suspected Discharge at Prairie State Gilts 11-14-13.pdf

Hi Guys,

Here is information on a PSm facility called Prairie State Gilt. I have had several complaints that they are overapplying. I would like to map out the field with the stream and see how close it is.

Sincerely,

Cheryl Burdett

Exemption 6

Sent: Friday, November 15, 2013 12:23 PM

To: Burdett, Cheryl

Exemption 6

Subject: Info on suspected discharge at Prairie State Gilts CAFO in Schuyler County, IL

Greetings Cheryl

Good to talk with you yesterday.

Attached is a letter with information on the suspected discharge at Prairie State Gilts that we discussed.

We have some more pictures and information on the recent water testing if you would like more details. Also, let me know if you would like originals of the photographs or the data log shown in the letter. We also have some aerial photos of land application on snow covered ground from a few years back if those might be of interest.

I will call you when the local residents inform us of land application taking place this year.

Many thanks for your time.

Exemption 6

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Via email

November 14, 2013

Cheryl Burdett
Water Division
Region 5 USEPA
77 West Jackson Blvd., WN-16J
Chicago, IL 60604
burdett.cheryl@epa.gov

Re: Suspected Illegal Discharge from Over-Application of Manure by Prairie State Gilt Farms, Schuyler County, Illinois

Dear Ms. Burdett:

This is to report a suspected illegal discharge by Prairie State Gilt Farms due to the over-application of waste on land adjacent to the facility and to request that the USEPA conduct a compliance inspection at the facility immediately.

We are requesting that the USEPA conduct this inspection because Prairie State Gilt Farms poses a high likelihood of causing immediate, continuous and severe damage to nearby waters.

Prairie State Gilt Farms is located in Schuyler County along 1920 Road North and Freeman Mine Road, near the town of Doddsville, Illinois (coordinates: 40°15'37.15"N, 90°41'49.07"W). The location of the facility is displayed in Figure 1 (on page 2 below).

Prairie State Gilt Farms is a farrowing facility. It holds 3,600 sows and additional piglets. According to the knowledge and belief of local residents, the facility has applied waste only on the same 210 acres of land for the past 17 years. This land application area is identified by the area outlined in red in Figure 1.

On Thursday, October 31, 2013 a member of Exemption 6) ran routine water testing on creeks, which drain south from the facility itself and its land application area. The area's first rainfall of the season started the day before on Wednesday, October 30, 2013, presenting an opportunity for baseline testing of the water within the creeks. The receiving water is the Horney Branch Creek.

During the October 31, 2013 water testing, the Exemption 6 member collected water from three separate sample points south of the Prairie State Gilt facility. The sample point locations are shown in Figure 1 as Sample Points A-E, hereinafter SPA-E. For comparative purposes, SPA-SPC and SPE are shown in Figure 2 (beginning on page 3 below). SPA is an upstream sample point. SPA shows clearer water with little to no discoloration compared to water downstream. SPB, SPC and SBE show evidence of brown, turbid water running into the receiving creek, indicating runoff from the land application area.

SPB-E receive water draining from the facility and its land application area. According to local residents, no land application of waste had taken place in the days immediately preceding the water testing. Crops on the land application area were just recently harvested during the week of November 11, 2013.

The Exemption 6 member tested for levels of nutrients, i.e., phosphate, ammonia, nitrate, and nitrate, from the water from SPB and SPC with an eXact Micro 7+ meter. Photos in Figure 2 display the collected water. Water testing results are included in a data log, which are provided in Figure 3 (beginning on page 5 below). The results show high levels of phosphate and ammonia, and low levels of nitrite and nitrate.

Again, we make this request of USEPA to immediately conduct a compliance inspection at the facility, because we are concerned that this facility poses an immediate threat to nearby waters. We request that you conduct a compliance inspection at this site as soon as possible in order to ensure that the facility complies with the Clean Water Act's permitting requirements.

Your attention to this matter is greatly appreciated.

Respectfully:

Exemption 6

cc:

Exemption 6

Exemption 6

Exemption 6

Figure 1

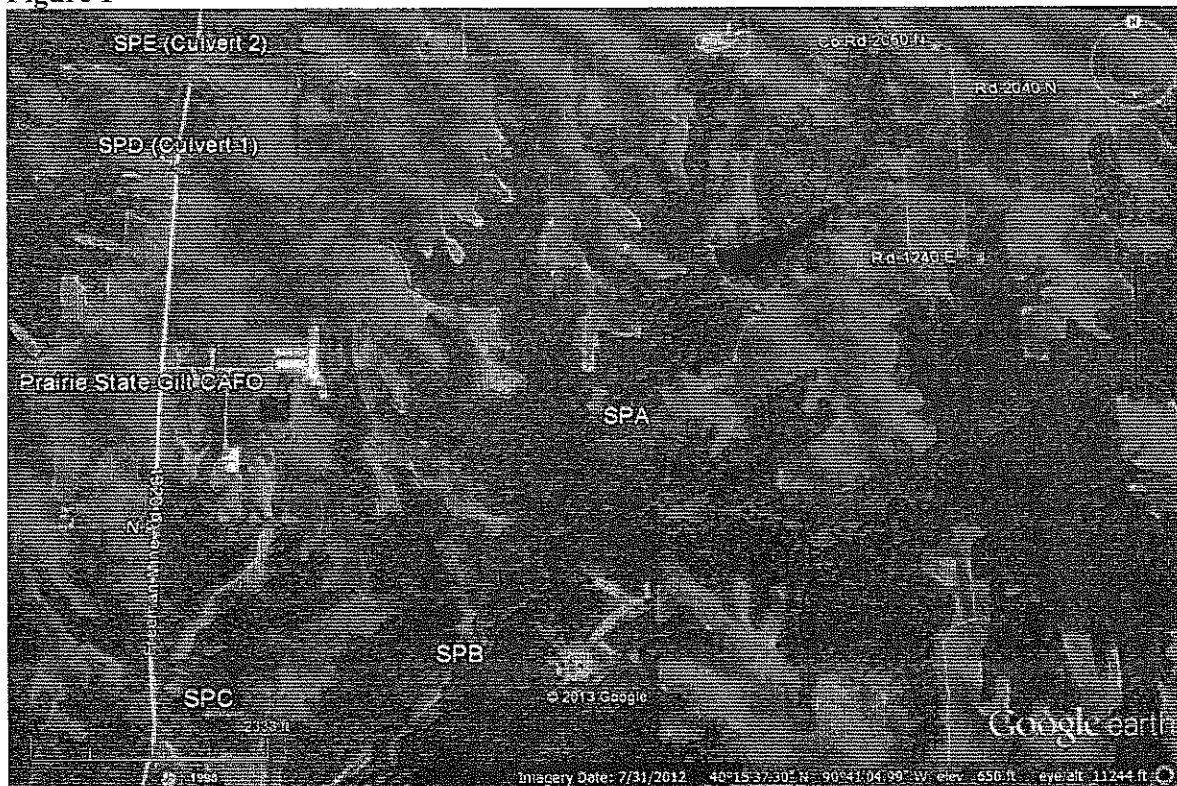


Figure 2

SPA – clear upstream sample point, with water collected in bottle.



SPB, facing north, with water collected in bottle.



SPC, facing east, with water collected in bottle



SPE, showing discolored and turbid water



Figure 3

Data log page 1

WATER MONITORING Data-Log for Prairie State Gilt, 3600 Swine, Schuyler County
 Facility name # & kind of animals location

Site Number (S#) 3 Facility Number (F#) 1 Facility Coordinates 40°15'37.15"N, 90°41'49.07"W Description of facility location along 1920 Rd N and Freeman Mine Rd.

Name of Monitor _____ Email _____ Phone Number _____ Date 10/31/13 Time _____

	SPA	SPB	SPC	SPD (Culvert 1)	SPE (Culvert 2)
Latitude and Longitude	40°15'34.79"N, 90°41'6.05"W	40°15'12.60"N, 90°41'24.00"W	40°15'7.74"N, 90°42'1.32"W	40°16'2.75"N, 90°42'4.36"W	40°16'15.21"N, 90°42'3.57"W
Property Owner	MICHAEL Smith	MICHAEL Smith			
General description of location (i.e., ditch along X Rd, ½ mile east of intersection of A and B, etc.)	HORNEY BRANCH EAST PROPERTY LINE	STREAM W SIDE OF SMITH ROAD	STREAM EAST OF SMITH PROPERTY		
Weather conditions (i.e., rain, snow)	LIGHT RAIN	LIGHT RAIN	LIGHT RAIN		
Direction wind is coming from (N, E, S, W)	NORTHWEST	NORTHWEST	NORTHWEST		
Air Temperature (°F)	55°	55°	55°		
Barometric Pressure	29.42	29.42	29.42		
Prior 5 day weather summary	RAIN PAST 2 DAYS	RAIN PAST 2 DAYS	RAIN PAST 2 DAYS		
Relevant activities taking place (i.e., spreading, emptying of lagoons)	NONE	NONE	NONE		
Direction of water flow (N, E, S, W) and Receiving waters	SOUTHWEST	SOUTH	SOUTHWEST		
Approximate water depth/ width/rate of flow	10" - NO FLOW	3" DEEP - 2' WIDE - STEADY FLOW	3" DEEP - 3' WIDE - RAPID FLOW		
Color of water (i.e., green, reddish, or brown algae)	FAIRLY CLEAR	MURKY	MURKY		
Is the water turbid or foamy? Describe...	NO	NO	NO		
Does the water have an odor? Describe...	NO	NO	NO		
Visual evidence of possible discharge (i.e., runoff into ditches, spraying) Describe...	NO	NO	NO		
Equipment used to measure samples (i.e., exact Micro 7+, thermometer, etc.)	EXACT MICRO 7+ Thermometer	SAME	SAME		


Data log procedures follow the Appendix 6 Water Monitoring Protocol (revised September 2013)

Data log page 2

	SPA	SPB	SPC	SPD	SPE
Date and Time of collection of water for monitoring	10-31-13 2:24 PM	10-31-13 2:34 PM	10-31-13 2:00 PM	10-31-13 1:40 PM	10-31-13 1:37 PM
Witness to water monitoring	EVERETT + PAULA DUNLAP	EVERETT + PAULA DUNLAP	EVERETT + PAULA DUNLAP		
Water temperature	53°	52°	53°		
Water pH (below 6 or over 9 indicates a discharge) <i>No STRIPS</i>		—	—		
Ammonia test results (<0.1 ppm ok) and expiration date of strip <i>EX 8/14</i>		71.3 (58)	61.0 (126)		
Nitrate test result (<10.0 ppm ok) and expiration date of strip <i>EX 12/14</i>		98.8 (0)	99.8 (0)		
Phosphate test results (<0.1 ppm ok) and expiration date of strip <i>EX 8/14</i>		86.6 (33)	80.0 (0.56)		
Nitrite test results (<1.0 ppm ok) and expiration date of strip <i>EX 6/14</i>		93.5 (0.03)	—		

If sufficient evidence of discharge, proceed to full lab sample. Were lab samples taken? ☐ Yes ☐ No

Photo Number	Direction of View	Description	Photographer and Witness
1082 1082.JPG	SOUTHERLY	LOCATION SPC STREAM @ BRIDGE W. SIDE Smith Property	Michael Smith
1083.JPG	WESTERLY	STREAM - LOCATION SPB MIDDLE OF Smith Property	Michael Smith

Data log procedures follow the  Water Monitoring Protocol (revised September 2013)